

## Canada Customer Privacy Policy

This version in effect since August 1, 2005

In this Privacy Policy, "we", "us" and "our" means the Canada operations of Rutledge Jewellers.

We recognize the importance of an individual's right to keep personally identifiable information private. This Privacy Policy ("**Policy**") explains how we manage and safeguard personal information in the course of operating our business in Canada. We are committed to protecting such privacy through ensuring that all personal information provided to Rutledge Jewellers is treated with care and, subject to this Policy, is not used or disclosed in ways to which consent has not been given by the disclosing individual. Rutledge Jewellers does not share any personal information with third parties except as disclosed in this Policy and with the customer's consent.

We are dedicated to adhering to the following principles that relate to the collection, use, retention and disclosure of personal information in Canada. These principles are based on Canada's *Personal Information Protection and Electronic Documents Act*, in effect since January 1, 2004.

### **Accountability**

Rutledge Jewellers is accountable for all personal information in its control. This includes information under the direct control of Rutledge Jewellers, as well as personal information that Rutledge Jewellers may transfer to its affiliates or to third party service providers for servicing, processing, storage or other purposes that facilitate Rutledge Jewellers business operations. Rutledge Jewellers will use contractual or other measures to require third parties that process information or provide services on our behalf, such as credit account verification and similar confirmations, to maintain a level of privacy protection comparable to our own practices.

Numerous individuals within Rutledge Jewellers are responsible for the day-to-day collection and processing of personal information, including our Sales Associates and account administration personnel. Any questions with regard to the manner in which Rutledge Jewellers handles or manages personal information should be directed to the owner Scott Rutledge who can be reached as follows:

**Scott Rutledge**  
**Rutledge Jewellers**  
**82 Brock Street West**  
**Uxbridge, Ontario L9P 1N6**  
**scott@rutledgejewellers.com**  
**Collection, Use and Disclosure of Personal Information**

We collect information from individuals who apply for credit accounts or who request to be added to our catalogue mailing list. We also establish a customer service record for each customer who consents to our doing so. We also collect personal information through our website at [www.rutledgejewellers.com](http://www.rutledgejewellers.com) and as described in the terms of use on that site.

We may use and disclose the personal information we collect from our customers and other individuals to manage our relationship with such individuals, to administer accounts, to provide business services and carry on our business operations and as may otherwise be required or permitted by law. For example, we may use personal information to provide customers with catalogues and other information regarding Rutledge Jewellers products, and to provide customers, at our discretion, with preferred customer benefits. We also analyze information about our customers to determine their preferences and to help us ensure that we are providing our customers with the types of goods and services that they are looking for.

Whenever collecting personal information for any other purpose, Rutledge Jewellers will disclose the purpose(s) for which the information is being collected, the manner in which Rutledge Jewellers plans to use the information and the entities to which the information will be disclosed. We do not collect personal information that is not necessary for the purposes we identify. We will not refuse to provide a service to an individual if they choose not to provide us with their personal information, unless their failure to provide such information makes us unable to provide such service.

### **Obtaining Consent**

In most cases, consent to the collection and use of personal information will be implied through the provision to Rutledge Jewellers, by a customer or other individual, of any and all information required for Rutledge Jewellers to provide its business services effectively, including insurance valuation requests and repair services. Such consent will also be implied when personal information is provided by customers through our website for purchases, services, requests and/or any other purpose. Rutledge Jewellers will notify and obtain the consent of the individual to whom the information relates only before collecting, using or disclosing personal information out of the ordinary course of business. If we

choose to use personal information already in our custody for a purpose that was not identified at the time we initially collected the information, we will seek the consent of the affected individuals before using this information for the new purpose, unless obtaining such consent is not required by law in the specific circumstances. Individuals may withdraw consent to the collection, use and disclosure of their personal information at any certain time. Note, however, that such withdrawal may make it impossible for Rutledge Jewellers to provide certain services to such individuals.

### **Limits To Collecting Personal Information**

We limit the type of mandatory information collected by us to only the personal information that is required to accomplish the identified purpose of managing our relationship with our customers and other individuals, to administer accounts, to provide services and to otherwise carry on Rutledge Jewellers business operations.

### **Management of Personal Information**

Rutledge Jewellers has implemented security safeguards to protect personal information in our control against loss, theft, misuse and interception by third parties. These safeguards include organizational, technical and physical measures designed to protect information from unauthorized access, disclosure, copying, use or modification. Among the steps taken are:

- *Premises security;*
- *Restricted file access to personal information;*
- *Technology safeguards, including security software, firewalls to prevent hacking and other unauthorized computer access; and*
- *Internal password and security policies.*

If requested, Rutledge Jewellers will make available certain information about our policies and practices relating to the management of personal information. Any such requests should be sent to Scott Rutledge who can be contacted as set out above.

### **Accuracy and Currency of Personal Information**

Rutledge Jewellers is committed to open and fair privacy practices which comply with the *Personal Information Protection and Electronic Documents Act* as well as any other applicable legislation.

Any individual may request access to the individual's personal information that Rutledge Jewellers has in its custody by contacting Scott Rutledge in writing. After receiving such a request, shall inform the individual of the existence, use and disclosure of their personal information and shall allow the individual to access such.

In certain circumstances, access to personal information may be denied. If we deny an individual's request for access to their personal information, we will advise such individual in writing of the reason for the refusal and they may then challenge our decision.

Where personal information is used on an on-going basis, Rutledge Jewellers undertakes to correct any information that is shown to be inaccurate, incomplete or not up to date. Otherwise, Tiffany does not routinely update personal information unless it is necessary to fulfil the purposes for which the information is collected. Rutledge Jewellers must be advised, by the individual to whom the information relates, of any correction to be made to their personal information. Rutledge Jewellers will take steps to ensure that this information is corrected.

Upon notification from an individual of their desire to have any or all of their personal information in our records deleted or destroyed, Rutledge Jewellers may undertake to delete or destroy all such information to the extent that retention of such information is not required by law, or for any other lawful business purpose, such as the investigation of claims or the defence of an action. In the event that an individual wishes to challenge Rutledge Jewellers compliance with any of these principles, they can contact Scott Rutledge using the contact information set out above. All complaints will be investigated. If Rutledge Jewellers finds a complaint to be justified, appropriate measures will be taken, including, if necessary, amending our policies and practices.

If you are not satisfied with our response, Scott Rutledge can be reached at 82 Brock Street, West, Uxbridge, Ontario, L9P 1N6, or by phone (905) 852-7846.

All policies and procedures of Rutledge Jewellers are reviewed periodically and, as such, we may change this Policy from time to time. This Policy is effective as of the date written at the top of this Policy.